

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT P. LARGESS

Plaintiff,

vs.

SUPREME JUDICIAL COURT FOR THE
STATE OF MASSACHUSETTS;
CHIEF JUSTICE MARGARET MARSHALL,
JUSTICE ROBERT J. CORDY, JUSTICE
JUDITH A. COWIN, JUSTICE JOHN M.
GREANEY, JUSTICE RODERICK L. IRELAND,
JUSTICE MARTHA B. SOSMAN, JUSTICE
FRANCIS X. SPINA, in their official capacities
as Justices of the Supreme Judicial Court of
Massachusetts; MASSACHUSETTS
DEPARTMENT OF PUBLIC HEALTH;
CHRISTINE C. FERGUSON, in her official
capacity as Commissioner of the Massachusetts
Department of Public Health; JUDY A.
McCARTHY, in her official capacity as City
Registrar for the City of Boston; CITY AND
TOWN CLERKS 1-350,

Defendants.

Case No.

04 - 10921 JLT

FILING FEE PAID:
RECEIPT # 35241
AMOUNT \$ 50.00
BY DPTY CLK
DATE 5/10/04

MOTION OF ATTORNEY MATHEW D. STAYER TO PROCEED PRO HAC VICE

COMES NOW the undersigned attorneys, pursuant to Local Rules of Practice for the United States District Court for the District of Massachusetts, Local Rule 83.5.3, and petitions this Court for permission for Mathew D. Stayer to appear Pro Hac Vice on behalf of the above-named Plaintiff, and in support thereof would show unto the Court as follows:

1. Mathew D. Stayer resides in Seminole County, Florida, and his office address is 210 E. Palmetto Avenue, Longwood, Florida 32850.

2. Mathew D. Staver has been admitted to the following courts:

Florida Supreme Court (includes all Florida State Courts) - 10/6/87

U.S. District Court for the Northern District of Florida - 3/21/95

U.S. District Court for the Middle District of Florida - 11/16/87

U.S. District Court for the Southern District of Florida - 4/27/95

U.S. District Court for the Eastern District of Wisconsin - 12/16/93

U.S. District Court for the Western District of Wisconsin - 5/4/01

U.S. District Court for the Southern District of Texas - 7/31/00

U.S. District Court for the District of Columbia - 10/3/94

U.S. District Court for the Western District of Michigan - 5/9/01

U.S. District Court for the Eastern District of Arkansas - 8/28/01

U.S. District Court for the Western District of Arkansas - 8/28/01

District of Columbia Court of Appeals - 10/4/93

United States Supreme Court - 1/14/91

U.S. Court of Appeals for the District of Columbia Circuit - 12/31/87

U.S. Court of Appeals for the First Circuit - 11/8/94

U.S. Court of Appeals for the Second Circuit - 8/24/94

U.S. Court of Appeals for the Third Circuit - 6/9/94

U.S. Court of Appeals for the Fourth Circuit - 6/15/94

U.S. Court of Appeals for the Fifth Circuit - 6/9/94

U.S. Court of Appeals for the Sixth Circuit - 2/28/94

U.S. Court of Appeals for the Seventh Circuit - 1/14/94

U.S. Court of Appeals for the Eighth Circuit - 7/20/94

U.S. Court of Appeals for the Ninth Circuit - 2/9/94

U.S. Court of Appeals for the Tenth Circuit - 3/4/94

U.S. Court of Appeals for the Eleventh Circuit - 10/14/87

Mathew D. Staver's status is active in all courts.

3. Mathew D. Staver received his J.D. from the University of Kentucky College of Law in 1987. He has practiced law continuously since 1987, and has participated in trials both in state and federal courts.

4. Mathew D. Staver has not been held in contempt of court, censured, suspended or disbarred by any court.

5. A Certificate of Good Standing from the Supreme Court of the State of Florida is attached to this Motion.

6. Mathew D. Staver is familiar with the provisions of the Judicial Code (Title 28 U.S.C.), which pertain to the jurisdiction of, and practice in, the United States District Courts; the Federal Rules of Civil Procedure and the Federal Rules of Evidence for the District Courts; the Local Rules of the District Court for the District of Massachusetts; and the Code of Professional Responsibility of the American Bar Association. Mathew D. Staver further affirms faithful adherence to these Rules and responsibilities.

7. It is necessary for Mathew D. Staver to appear in this matter because of his expertise in the issues presented in this case.


8. Mathew D. Staver has retained local counsel who is a member of the bar of this Court to assist in the representation in this case, and agrees that local counsel will sign all pleadings or

other papers and participate in the preparation and prosecution of the case or proceedings to the extent required by the Court and the Local Rules.

WHEREFORE the undersigned counsel, respectfully requests that this Court grant permission for Mathew D. Staver to appear Pro Hac Vice.


Dated this 10th day of May, 2004.

Respectfully Submitted,


Chester Darling by Rm

Chester Darling
BBO# 114320

CITIZENS FOR THE PRESERVATION
OF CONSTITUTIONAL RIGHTS, INC.
306 Dartmouth Street
Boston, MA 02116
Telephone: (617) 536-1776
Telefacsimile: (978) 470-2219
Local Counsel for Plaintiff



Mathew D. Staver
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Attorneys for Plaintiff

Supreme Court of Florida

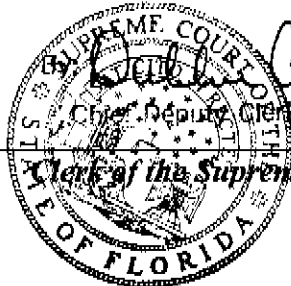
Certificate of Good Standing

I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that

MATHEW DUANE STAVER

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on October 6, 1987, is presently in good standing, and that the private and professional character of the attorney appear to be good.

*WITNESS my hand and the Seal of the
Supreme Court of Florida at Tallahassee,
the Capital, this April 27, 2004.*



Chief Deputy Clerk

Clerk of the Supreme Court of Florida.